



**ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)
COMPLIANCE EVALUATION INSPECTION (CEI) REPORT**

AUTHOR OF REPORT

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Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

FACILITY INFORMATION

Shell Chemical LP
400 Industrial Parkway
Saraland (Mobile County), AL 36571
EPA Identification Number: ALD020852422
NAICS Code(s): 49311

Website: www.shell.com

RESPONSIBLE OFFICIALS

Mr. Mike Hamner,
Telephone: 251-679-7124
Email: Michael.hamner@shell.com

INSPECTION PARTICIPANTS

Mrs. Mike Hamner, Environmental Specialist -Shell
Mr. Marlon McMillian, Environmental Scientist, Sr. – ADEM

DATE OF INSPECTION

August 6, 2015

APPLICABLE REGULATIONS

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

PURPOSE OF INSPECTION

The purpose of the inspection was to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.

FACILITY DESCRIPTION

Shell Chemical LP (Shell) is a primary and secondary petroleum refinery located on a seven acre parcel in Saraland, AL. The facility produces sulfur-rich diesel fuel, kerosene and petroleum residuals. Some portions of the sulfur-rich diesel are processed further to meet commercial diesel standards. While kerosene is filtered further to meet the specifications to become jet fuel. The petroleum residuals are sent offsite where they are processed and are ultimately used in the production of plastics. The wastewaters are generated from the processes are processed at onsite wastewater treatment unit. The sludge generated from this unit is sent offsite to the Norco Manufacturing Complex in New Orleans, LA to be processed into ethylene. The QA/QC labs generate hazardous waste from the various analytical tests that are performed before the products are sent to market.

Shell has 190 full-time employees and the facility operates continuously 24 hours/day. According to the facility's most recent submittal of ADEM Form 8700-12 (which was received by the Department on December 15, 2014), is a large quantity generator of hazardous waste, a small quantity handler of universal waste. The hazardous waste generated at this facility is from catalyst change outs and the removal of tank bottoms.

OBSERVATIONS

I arrived at the facility at approximately 1:30 pm. I was greeted by Mr. Mike Hamner. During the opening conference that followed, I explained the purpose and scope of the inspection.

Following the opening conference, Mr. Hamner provided a tour of the facility. During the walk-through, I inspected the hazardous waste storage area and the lab. No hazardous waste was observed or managed in the product storage warehouse area. The hazardous waste is managed in a room on the north side of the warehouse. My observations are as follows:

Hazardous Waste Storage

We began the inspection in the hazardous waste storage area which is located near the center of the facility. The hazardous waste storage area consists of a concrete pad with a metal roof. The area is approximately 40 feet x 40 feet and surrounded by a chain link fence. Access is controlled by a gate that is locked at all times. The surface of the concrete floor has a protective coating and bermed on three sides. The protective coating showed signs of wear in several sections (see pictures below). There were four 55-gallon drums of hazardous waste and one 5-gallon bucket of hazardous waste present in the area. The drums were all closed, in good condition, and dated within the allowable time period for large quantity generator.

Hazardous Waste Storage Area



Entrance to hazardous waste storage area



Drums separated according to the posted signs



Area of degradation in the northwest corner



Area of degradation in the northeast corner



Area of degradation on the west side of the area



Area of degradation on the east side of the area

Paint Yard

From the hazardous waste storage area we moved east to the paint yard. This area was a metal roof open-air shed with a chain link fence surrounding it. One 55-gallon drum was in this area for satellite accumulation. The drum was in good condition, closed and labeled "Paint Waste". No issues were noted in this area.

WWTU

From the paint yard, we moved to the wastewater treatment unit which is located next to the hazardous waste storage area. There was a hazardous waste storage tank that was approximately 1000 gallons located near the road. This tank was a holding tank that was labeled K048. Mr. Hamner stated that the facility does not manage this tank as a hazardous waste tank because of an exemption found in ADEM Admin. Code r. Div. 335-14-2-.01(4)12(i). This material is sent offsite for recycling. No issues were noted in this area.

Following the walkthrough, Mr. Hamner provided the following documents.

- Hazardous waste weekly inspection logs
- Hazardous waste manifests
- Hazardous waste employee training
- Waste minimization plan
- Contingency plan
- Hazardous Waste Report
- Notification of regulated waste activity

My review of the aforementioned documents revealed that the required documents and records were accurate and complete.

SUMMARY

Based on the observations made during the review of relevant documents and records and the walkthrough inspection of the facility, Shell appears to be as it described itself in its notification.

After completion of the records review, a closing meeting was held with Mr. Hamner to review the preliminary inspection results. During the closing meeting, I prepared and then issued to Shell a *Preliminary Inspection Report* (ADEM Form 19). Mr. Hamner acknowledged receipt by signing the form. The "original" signed form was given to Mr. Hamner for the facility's records. I departed the site at approximately 4:45 pm.

SIGNED

Compliance and Enforcement Section, Industrial Hazardous Waste Branch
Land Division

February 18, 2016



Date

CONCURRENCE

A handwritten signature in black ink that reads "Clethes Stallworth". The signature is written in a cursive style with a horizontal line underneath.

Clethes Stallworth, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

February 18, 2016

Date